

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

**DECLARATION OF MILES EHRlich  
IN SUPPORT OF PLAINTIFF  
WAYMO'S ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL ITS  
BRIEF AND SUPPORTING  
DOCUMENTS ON THE DILIGENCED  
EMPLOYEES' WAIVER OF  
ATTORNEY-CLIENT PRIVILEGE  
FOR MATERIALS PROVIDED TO  
STROZ FRIEDBERG (Dkt. Nos. 1743  
and 1747)**

2. I make this declaration in support of Waymo's Administrative Motion to File Under Seal Its Brief And Supporting Documents On The Diligenced Employees' Waiver of Attorney-Client Privilege For Materials Provided to Stroz Friedberg (Dkt. Nos. 1743 and 1747)

(“The Administrative Motion”). The Administrative Motion seeks an order sealing the following documents based on Mr. Levandowski’s designation of privilege and/or confidentiality:

Document	Portion to Be Filed Under Seal	Designating Party
Waymo’s Brief on the Diligenced Employee’s waiver of attorney-client privilege for materials provided to Stroz Friedberg (“Waymo’s Brief” Dkt. 1747)	Highlighted Portions	Anthony Levandowski
Exhibit 1 to Waymo’s Brief (Dkt. 1743)	Entire Document	Anthony Levandowski
Exhibit 2 to Waymo’s Brief (Dkt. 1743)	Entire Document	Anthony Levandowski
Exhibit 3 to Waymo’s Brief (Dkt. 1743)	Entire Document	Anthony Levandowski
Exhibit 6 to Waymo’s Brief (Dkt. 1743)	Entire Document	Anthony Levandowski

3. Mr. Levandowski does not assert that the highlighted portions of Waymo’s Brief, or Exhibits 1, 2, and 3, to Waymo’s brief merit sealing.

4. Mr. Levandowski seeks to maintain the confidentiality of Exhibit 6 because it contains sensitive and highly confidential information regarding the legal advice he has sought – over an approximately ten-year period – for both personal and business matters (some of which are wholly unrelated to this litigation). The information contained in Exhibit 6 includes attorneys’ names, email addresses, and subject matter of the advice Mr. Levandowski sought from his attorneys; therefore, Mr. Levandowski asserts that Exhibit 6 merits sealing.

I declare under penalty of perjury under the laws of the State of California and the United

1 States of America that the foregoing is true and correct, and that this declaration was executed in  
2 Berkeley, California, on September 25, 2017.

3  
4 Date: September 26, 2017

Respectfully submitted,

5  
6 /s/ Miles Ehrlich

Miles Ehrlich

Ramsey & Ehrlich LLP

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8 *Counsel for Non-Party Anthony*  
9 *Levandowski*